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April 9, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Court
500 Pearl Street, Room 1040
New York, New York 10007-1312

Re: Doe v. Combs, et al., Case No. 1:23-cv-10628 (JGLC)

Dear Judge Clarke:

We are the attorneys for Defendants Sean Combs, Daddy's House Recording Studio, Inc., and Bad Boy Entertainment Holdings, Inc. (collectively, the "Combs Defendants").

In accordance with Rule 2(e) of the Court's Individual Rules and Practices in Civil Cases, we file this joint letter-motion on behalf of all parties for a modification of the deadline, pursuant to Fed. R. Civ. P. 15, to answer, move, or otherwise respond to the Amended Complaint [Dkt. No. 52]. All parties consent to the proposed modification. This is their first request for an extension of time concerning the Amended Complaint.

On February 20, 2024, the Combs Defendants filed a motion to dismiss the Complaint [Dkt. No. 43], and on February 23, filed a supplemental motion for judgment on the pleadings [Dkt. No. 47]. On February 24, Defendant Harve Pierre joined the supplemental motion for judgment on the pleadings [Dkt. No. 48], having already filed his Answer. On March 5, 2024, the Court granted the parties' joint request for an extension of time for Plaintiff to file opposition papers to the motions, or an amended pleading, and for Defendants to reply to any opposition [Dkt. No. 51]. On March 29, 2024, Plaintiff filed the Amended Complaint.

Under Fed. R. Civ. P. 15, the deadline to answer, move, or otherwise respond to the Amended Complaint is April 12, 2024. Because of the filing of the Amended Complaint, and the Combs Defendants' recent retention of different co-counsel, Pillsbury Winthrop Shaw Pittman LLP, the parties respectfully request that the Court re-set the deadline to answer, move, or otherwise respond to the Amended Complaint from April 12, 2024 to May 17, 2024, and set Plaintiff's time to file any opposition thereto by June 28, 2024, with any reply due by July 19, 2024.

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Because this action is in its early stages, the requested extension will not prejudice or inconvenience any party or cause any undue delay. The Court has not yet entered a Case Management Order, and there is no appearance before the Court currently scheduled, so the requested extension will not impact any scheduled date.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

JDD:hs

cc: Douglas H. Wigdor, Esq.
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(All Via ECF)